

Jay Larry Moyer
370 W. Johnson Street (C-1)
Philadelphia, PA 19144
267-693-2633

RECEIVED

December, 14, 2015

DEC 14 2015

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P. O. Box 3265
Harrisburg, Pennsylvania 17120

Consolidated Docket Numbers: C-2011-2273645 **AND** C-2014-2444864

Ms. Chiavetta:

In the midst of the many facts that have proliferated in the above cases, one recent bill for *November 10, 2015*, provides a distinct example of the continuing errors and the flawed methodology for applying generation credit to my house account (Acct. # 06476-21001). The enclosed bill refutes the Company's claim that it "eventually developed and fine-tuned the manual process"¹, a claim repeated on November 9, 2015 in its Reply to Exceptions.²

The "Excess credit" of \$52.60 is incorrect and cannot be defended. It represents an explicit and conspicuous error that has not been highlighted previously.

The provision in 52 Pa. Code § 75.13(c) is clear: "The EDC shall credit a customer-generator at the full retail rate, which shall include generation, transmission and distribution charges, for each kilowatt-hour produced by a Tier I or Tier II resource installed on the customer-generator's side of the electric revenue meter, up to the total amount of electricity used by that customer during the billing period."

In every month from June to November, 2015, the solar panels generated more kilowatt hours than were used. During those months, the panels generated 3,344 kWh's, and the reported usage was 2,182 kWh's. As repeatedly noted, the bills provided by PPL Electric do not report the amount generated, but the GATS reporting is shown below alongside the Complainant's actual usage, as shown on his PPL bills:

¹ PPL Electric Statement No. 1 (Rebuttal Testimony), March 6, 2015, at 14

² "PPL Electric has fine-tuned this manual billing process"; Replies to Exceptions (Footnote 3, p. 4)

<u>REPORTED TO GATS</u>		<u>REPORTED USAGE (Acct. #06476-21001)</u>
June, 2015	657 kWh	284 kWh
July, 2015	667 kWh	294 kWh
August, 2015	726 kWh	343 kWh
September, 2015	458 kWh	378 kWh
October, 2015	438 kWh	400 kWh
November, 2015	<u>398 kWh</u>	<u>483 kWh</u>
TOTAL	3,344 kWh	2,182 kWh

The combined "excess kilowatt hours" that were "carried forward" from previous months total 1,162 kWh's (3,344 minus 2,182).

According to the bill for November 10, 2015, the "total amount of electricity used" was 483 kWh's. The "full retail" value, based on the bill itself, totals 12.979 cents per kilowatt hour (Distribution: 3.487 + Transmission: 1.279 + Generation: 8.213). The credit applied to the account (06476-21001) should have been based on 483 kWh's @ 12.979/kWh, or a total of \$62.69.

Note: The generation reported in November (398 kWh) was indeed less than the total amount used (483 kWh), but the kilowatt hours "carried forward" from previous months (1,162 of "banked" credit) were more than sufficient to make up the difference.

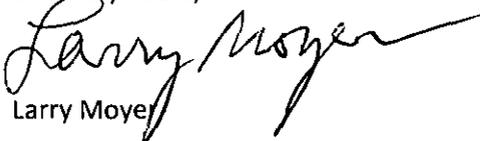
According to PPL Electric documents, the credit amount is derived from the previous month's generation. That practice of delaying credit, even if warranted, would not obviate the requirement of applying credit "up to the total amount of electricity used by that customer during the billing period". 52 Pa. Code § 75.13(c)

The information available simply does not support the credit of \$52.60 which was applied on November 10, 2015.

The serious issues in the above cases have churned for more than five years. In light of the protracted nature of these proceedings, I hereby request that the Office of Special Assistants regard this letter and the attached bill as material evidence and include them in their review of the Exceptions which I filed in October, 2015, in response to the Initial Decision on Remand.

I ask respectfully for confirmation that this letter and the enclosed electric bill will be reviewed as requested. In the absence of such confirmation, I will conclude that this evidence (and any other similar, recent bills) should be submitted in a new and separate Complaint.

Sincerely Yours,


Larry Moyer

Encl: PPL bill for 11/10/2015 (Acct. # 06476-21001)
Certificate of Service

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PPL Electric Utilities



Pay/Manage your account online at pplelectric.com



Questions? Please contact us by Dec 1. 1-800-DIAL-PPL (1-800-342-5775) M-F: 8am to 5pm

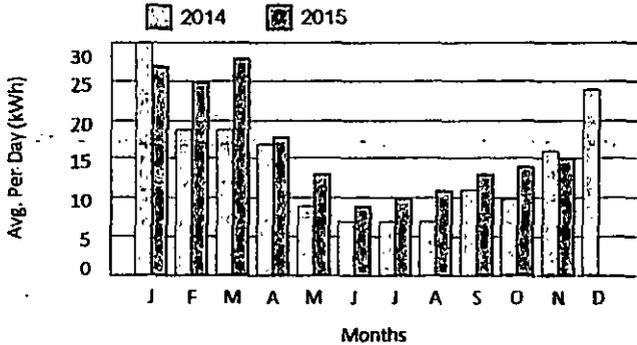
Bill Acct. No.	Due Date	Amount Due
06476-21001	Dec 1, 2015	\$891.56

Your Electric Usage Profile

Service to:
LARRY MOYER
73 WOODS RD
KLINGERSTOWN, PA 17941

Meter: 49749430
Your next meter reading is on or about Dec 10, 2015.

This section helps you understand your year-to-year electric use by month. Meter readings are actual unless otherwise noted.



Monthly Comparison	Days Billed	kWh	Average kWh/Day	Average Temp.
Nov 2015	32	483	15	51F
Nov 2014	31	485	16	51F

Billing Period	Type	Reading
Nov 10	Actual	56932
Oct 9	Actual	56449
32 Days	kWh Billed	483

Yearly Comparison	Total Use	Avg. Monthly
Dec 2014 - Nov 2015	6269	522
Dec 2013 - Nov 2014	5419	452

Billing Summary

(Billing details on back)

Balance as of Nov 10, 2015	\$865.65
Charges:	
Total Distribution Charges	\$32.66
Total Generation & Transmission Charges	\$45.85
Total Other Charges	-\$52.60

Total Current Charges **\$891.56**

Amount Due By Dec 1, 2015 \$891.56

Account Balance **\$891.56**

How To Shop For Electricity

You can choose the company that supplies your electricity. Visit papowerswitch.com or www.oca.state.pa.us for supplier offers. If you are shopping, know your contract expiration date.

Here's the information you need to shop:

Bill Account Number: 06476-21001 Rate Schedule: RS (Residential)

Current Supplier: PPL Electric Utilities

PPL Electric Utilities price to compare for your rate is \$0.09493 per kWh. This changes the 1st of June and December.

Manage Your Account

Pay Your Bill	Online Options (pplectric.com)
Online: Visit pplectric.com	- Report an outage/check outage status
Phone: Call 1-800-342-5775	- Make a payment, view your bill and usage history.
Mail: Use envelope provided	- Sign up for alerts.
Card: MasterCard, Discover, Visa or debit, call 1-800-672-2413 (service fee applies)	- Enroll in paperless billing, automatic bill pay, budget billing.
	- View your rate schedule at: pplectric.com/rates

Correspondence:

Customer Services, 827 Hausman Road, Allentown, PA 18104-9392

Other important information on the back of this bill →

Return this stub in the envelope provided with a check payable to PPL Electric Utilities.



PPL Electric Utilities

MB 01 004582 84585 E 21 B



LARRY MOYER
370 W JOHNSON ST UNIT C1
PHILADELPHIA, PA 19144-3119

Bill Acct. No.	Due Date	Amount Due
06476-21001	Dec 1, 2015	\$891.56

Amount Enclosed:



PPL ELECTRIC UTILITIES
2 NORTH 9TH STREET CPC-GENN1
ALLENTOWN, PA 18101-1175



1 3200008915620000891562 0647621001

Your Message Center

- The \$865.65 balance includes \$19.41 in prior late payment charges.
- With paperless billing, you can receive and pay your PPL Electric Utilities bills online. The process is free, quick, convenient and secure. To learn more or sign up, visit pplelectric.com.
- Information about appliance energy use and tips on saving energy are available through the Energy Library on our Web site, pplelectric.com/e-power
- Before digging around your home or property, you should always call the state's One Call notification system to locate any underground utility lines. You can do this by simply dialing 811, which will connect you to the One Call system. Be safe and call 811 before you dig.
- Heating your home is the biggest part of your winter energy needs. Check your heating system filter(s) monthly. Clean or change filters as needed. You can save money since your system will use less energy.

General Information

Generation prices and charges are set by the electric generation supplier you have chosen. The Public Utility Commission regulates distribution rates and services. The Federal Energy Regulatory Commission regulates transmission prices and services.

PPL Electric Utilities uses about \$13.31 of this bill to pay state taxes and about \$55.70 is used to pay the PA Gross Receipts Tax.

Understanding Your Bill

Customer Charge - Monthly charge to recover costs of billing, meters and equipment.

Distribution Charge - Monthly charge to recover costs of local equipment used to deliver electricity from high-voltage transmission lines (see Transmission Charge) and safely step down voltage for use in your home or business.

System Improvement Charge - Monthly charge to recover costs for improving, repairing and replacing equipment that delivers electricity to your home or business.

Generation Charge - Monthly charge to recover the cost of the production or purchase of electricity.

kWh (Kilowatt-hour) - A measure of how much electricity your household uses. One kilowatt-hour equals the amount of electricity used by ten 100-watt lights left on for one hour.

Rate RS - Rate for service to a private home.

Billing Details - (Bill Acct. 06476-21001)

Previous Balance	\$865.65
<i>Balance as of Nov 10, 2015</i>	<i>\$865.65</i>
Charges for - PPL Electric Utilities	
Residential Rate: RS for Oct 9 - Nov 10	
Distribution Charge:	
Customer Charge	14.30
483 kWh at 3.48700000¢ per kWh	16.84
System Improvement Charge at 5.00%	1.56
PA Tax Adj Surcharge at -0.13300000%	-0.04
Total Distribution Charges	\$32.66
Generation & Transmission Charges for Oct 9 - Nov 10	
Transmission Charge:	
483 kWh at 1.27900000¢ per kWh	6.18
Generation Charge:	
Capacity and Energy	
483 kWh at 8.21300000¢ per kWh	39.67
Total Generation & Transmission Charges	\$45.85
Other Charges for PPL Electric Utilities	
Excess Credit	-52.60
Total of Other Charges	\$-52.60
Amount Due By Dec 1, 2015	\$891.56
Account Balance	\$891.56

Smart Meter Rider - Monthly charge to recover costs associated with the smart meter programs approved by the PUC.

State Tax Adjustment Surcharge - Monthly charge or credit to reflect changes in various state taxes. The surcharge may vary by bill component.

Transmission Charge - Monthly charge to recover the cost of moving electricity over high-voltage transmission lines from generation facilities to PPL Electric Utilities' distribution lines (see Distribution Charge).

Type(s) of Meter Readings:

Actual - Measures your monthly electricity use based on an actual reading.

Certificate of Service

Complainant's Submittal New evidence of billing errors

RE: Docket No. C-2011-2273645 and Docket No. C-2014-2444864

I hereby certify that I have this day served a true copy of the foregoing Submittal upon the parties, listed below, in accordance with the requirements of § 1.54 (relating to service by a party).

Via USPS First Class Mail

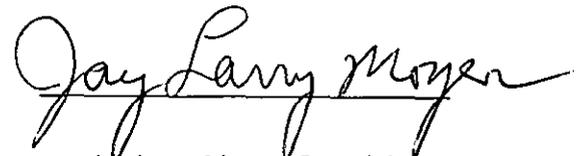
Christopher T. Wright, Esquire
Post & Schell PC
17 North Second Street, 12th floor
Harrisburg, PA 17101-1601
(Served via USPS First Class Mail)

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Philadelphia, PA 19144



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U.S. POSTAGE
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AMOUNT

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Ms. Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street, 2nd Floor North
P. O. Box 3265
Harrisburg, Pennsylvania 17120